

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

DISTRICT OF NH

FILED

2020 JUN 26 P 1:06

Sensa Verogna, Plaintiff,)
v.)
Twitter Inc., Defendant.)

Case #: 1:20-cv-00536-SM

**PLAINTIFF'S REPLY AND MEMORANDUM OF LAW IN SUPPORT TO
DEFENDANT'S OBJECTION TO PLAINTIFF'S MOTION FOR DEFAULT BY CLERK**

1. Plaintiff, respectfully replies to Defendant's Objection [Doc. 18] to Plaintiff's Motion for default by Clerk [Doc. 7]. In support of this reply, Plaintiff submits herewith Plaintiff's Memorandum of Law in Support of Plaintiffs' Motions for Default.

2. Ms. Schwartz having since moved for admission pro hac vice. [Doc. 9] is moot as it occurred after her June 1, 2020 submittal.

3. A snapshot of the Defendant's Motion, Memorandum and Declaration on June 1, 2020, "[Doc. 3]"

Respectfully, submitted,

Twitter, Inc.

By its attorneys,

ORR & RENO, PROFESSIONAL ASSOCIATION

4. Defendants cannot argue that submitting documents to the Court, by its attorneys, on behalf of its corporate client, is not a practice of law.

5. Defendants propose that this Court, while maintaining professional competence in the law, accept its submittal [Doc. 3] as if somehow an illegal document submitted by someone unauthorized to practice before the Court, on behalf of a corporate client would fall into the parameters set within Fed. R. Civ. P. 12 and that breaking the law, by unauthorized practice of law

within the forum of this Court, should be accepted as comporting to Fed. R. Civ. P. 12 and would promote public confidence in the integrity and impartiality of this Court.


6. Defendant propose that presenting a Defense by unauthorized practice of law in violation of N.H. RSA 311:7 satisfies the requirements under Fed. R. Civ. P. 12. It does not.

7. Indirectly the Defendant proposes that this Court accept that by notating on the submittal [Doc. 3] "*motion for pro hac vice admission to be filed.*" somehow constitutes a motion for Pro Hac Vice when the words themselves "to be filed" clearly demonstrate that the Motion for Pro Hac Vice had not, in fact, been filed under rule Local Rule 83.2(b).

8. Ms. Schwartz's "unauthorized practice of law" in submitting to the Court on behalf of a corporate client, [Doc. 3], prior to being admitted by the Court and prior to taking the oath prescribed in RSA 311:6 and in violation of NHRSA 311:7 should be stricken from the record. See Plaintiff's Request for Default by Clerk, [Doc. 7], and Motion to Strike [Doc. 14].

9. For the reasons stated herein this Reply and Memorandum of law in support and for the reasons set forth in Plaintiffs Request for Entry of Default by Clerk and the attached Declaration and Exhibit A in support thereof, Plaintiff Requests that the Clerk or Court declare the Defendant, Twitter, Inc. in default.

Respectfully,


 /s/ Plaintiff, Anonymously as Sensa Verogna
SensaVerogna@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of June 2020, the foregoing document was made upon the Defendant, through its attorneys of record to Jonathan M. Eck jeck@orr-reno.com and Julie E. Schwartz, Esq., JSchwartz@perkinscoie.com